

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Advanced Television Systems and)	MB Docket No. 87-268
Their Impact Upon the Existing)	
Television Broadcast Service)	
)	

To: The Commission

PETITION FOR PARTIAL RECONSIDERATION

Pursuant to Section 1.429(a) of the Commission's rules, WNAC, LLC, licensee of WNAC-DT, Providence, Rhode Island (Fac. ID 73311) ("WNAC" or the "Station") respectfully requests partial reconsideration of the Seventh Report and Order ("*Seventh R&O*") in the above-captioned proceeding.¹ WNAC, LLC has evaluated the facilities specified in Appendix B of the *Seventh R&O* (the "DTV Table") for post-transition operation of WNAC and determined that it is not possible to stay within the theoretical contour of the specified facilities unless the Station reduces power significantly, resulting in a substantial loss of service area. Accordingly, WNAC, LLC respectfully requests revision of WNAC's allotment to permit construction of post-transition facilities that will preserve the Station's existing service area.

WNAC currently is licensed on digital channel 54 and analog channel 64.² Since neither of these channels will be available for post-transition operation, WNAC elected and was allotted

¹ See *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Seventh Report and Order, MB Docket No. 87-268, FCC 07-138 (rel. Aug. 6, 2007). The *Seventh R&O* was published in the Federal Register on September 26, 2007. See 72 Fed. Reg. 54720 (Sept. 26, 2007).

² See File Nos. BLCDT-20041025AEL & BLCT-19880418KF.

DTV channel 12 at an ERP of 11.5 kW and a HAAT of 295 meters, as currently specified in the DTV Table. In order to fit within the theoretical antenna pattern specified in the DTV Table (Antenna ID 74616), however, WNAC would be required to reduce its ERP to 8.5 kW on DTV channel 12. As the Technical Exhibit and contour map at Attachment A demonstrate, at such a reduced power WNAC would be unable to provide post-transition DTV service to a significant portion of its existing and allotted service area, encompassing approximately 87,000 viewers who currently receive the Station's signal. To prevent this substantial service loss, WNAC, LLC requests revision of WNAC's Channel 12 allotment in the DTV Table to permit the station to continue to serve existing viewers.³

Grant of the requested relief will serve the public interest. As the Commission recently acknowledged, certain "stations may be unable to build precisely the facilities specified in the new DTV Table Appendix B (for example, if an antenna producing the exact antenna pattern described in Appendix B is not available)."⁴ The Commission further expressed concern that such stations might "be required to reduce their facilities so significantly that they will be unable to provide adequate service" to their communities.⁵ WNAC faces this "theoretical facility" problem in that it cannot construct the facilities specified in the DTV Table without incurring substantial service losses. A revised allotment for WNAC that produces a better match between

³ For example, the allotment could be changed to afford the Station a greater number of antenna choices than the pattern currently specified or to allow the Station to increase power to preserve its service area.

⁴ *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, Notice of Proposed Rulemaking, MB Docket No. 07-91, FCC 07-70, ¶ 93 (rel. May 18, 2007).


⁵ *Id.*

the Station's pre- and post-transition service areas will allow the Station to continue to serve existing viewers.

For the foregoing reasons, WNAC, LLC respectfully requests reconsideration of the *Seventh R&O* to revise WNAC's post-transition allotment in DTV Table in a manner that will preserve the Station's current service area.

Respectfully submitted,

WNAC, LLC

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October 26, 2007

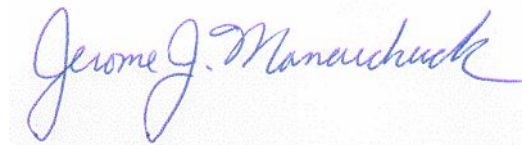
Attachment A

TECHNICAL EXHIBIT
IN SUPPORT OF COMMENTS FILED BY
TELEVISION STATION WNAC
PROVIDENCE, RHODE ISLAND

Technical Exhibit

In the Seventh Report and Order and Eighth Further Notice of Proposed Rule Making, TV station WNAC was allotted a DTV operation on channel 12 with a maximum directional ERP of 11.5 kilowatts, and an RCMSL of 323 meters. This facility is based on a hypothetical directional antenna pattern. WNAC has obtained a directional antenna design to try to match the pattern, however the pattern differs from the allotment pattern, and will require a reduction in ERP. Specifically, WNAC will have to reduce its ERP from 11.5 kilowatts to 8.5 kilowatts in order to prevent extension of the noise-limited contour.

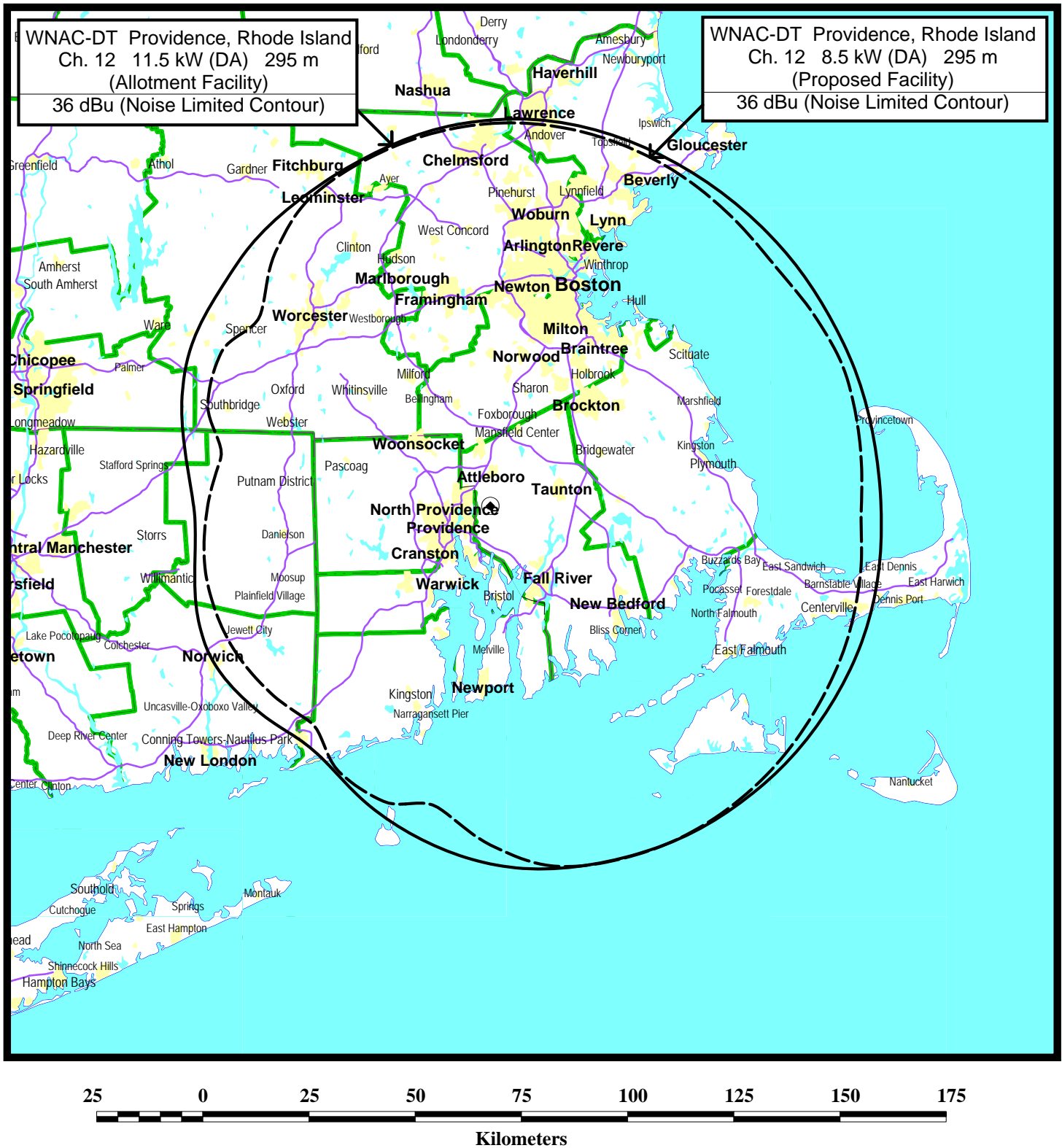
Figure 1 is a coverage map showing the noise-limited contour for the WNAC post-transition allotment facility and also for the 8.5 kilowatt proposal. According to the FCC's Seventh Report and Order and Eighth Further Notice of Proposed Rule Making, WNAC has an interference free service population of 5,899,000 persons and an interference free service area of 21,844 square kilometers. Based on the 8.5 kilowatt proposal, the interference free service population for WNAC will be 5,811,912 and the interference free service area is 20,232. Therefore, in order to prevent extension of the noise-limited contour, WNAC's interference free service population will be reduced by 87,088 persons.



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FCC PREDICTED COVERAGE CONTOURS

DTV STATION WNAC-DT
PROVIDENCE, RHODE ISLAND
CH 12 8.5 KW (DA) 295 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida